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October 6, 2004

Secretary
Federal Communications Commission
Washington, DC 20054

Re: Submission to WT Docket No. 98-228

Please accept this document as an application by LaserGrade LP to become an FCC COLE Manager. LaserGrade LP has acquired the assets of former COLE Manager LaserGrade Computer Testing and wishes to continue administering FCC examinations at our testing centers located throughout the United States.

Description and Qualifications

LaserGrade LP is a computer-based testing network with headquarters near the Portland (PDX) International Airport, in Vancouver, WA.

LaserGrade LP provides proctored and secured testing at over 700 testing locations in the US and Canada, plus 30 overseas. We have over 2000 testing seats available each hour, along with central and live call-center registration services. LaserGrade administers over 100,000 examinations each year.

LaserGrade LP is one of only two computer-based testing companies authorized to administer all Federal Aviation Administration (FAA) Airman Knowledge Tests.

Our list of Examination Sponsors include: The Federal Aviation Administration, The International Codes Council, Washington State Department of Labor and Industry, The National Registry of Food Safety Professionals, The National Interstate Council of State Boards of Cosmetology, and The National Association of Boards of Pharmacy.

LaserGrade LP is now managed by a group of three individuals who are highly qualified to lead LaserGrade LP. They are Judith Moore, Chief Executive Officer, Mark Setash, Chief Operating Officer and Stephen Quimby, Chief Technology officer. They have several decades of successful experience in the occupational and professional assessment and testing industry.

Recently they were executives with the Chauncey Group International from 1998-2002. Chauncey is the for-profit testing industry subsidiary of Educational Testing Service (ETS), the world's largest private educational testing and measurement organization.



Judith Moore, Chief Executive Officer. Ms. Moore was recently President of EdVerify, Inc., a firm providing technologies for credentialing verification. She was President and CEO of the Chauncey Group International from 1998 to 2002. The board recruited her to grow a new for profit subsidiary owned by ETS, Educational Testing Service. In three years, Chauncey became the largest provider of certification, licensure and assessments for occupations and professions as well as the largest providers of English language testing in the world.

Prior to joining Chauncey she was President and CEO of National Industries for the Blind from 1994 to 1998. She also held a series of management positions at Eastman Kodak from 1982 to 1994. Additionally she has served on numerous boards, including Sylvan Learning Systems.

Mark A Setash, Chief Operating Officer. Mr. Setash was recently Chief Operating Officer of EdVerify, Inc. Additionally he was Managing Principal of Operations for the Chauncey Group, and with the National Industries for the Blind as an MIS manager for 13 years.

While at Chauncey he managed call centers and had directed the NCARB, architect's national exam program.

Stephen M. Quimby, Chief Technology Officer. Mr. Quimby has over 25 years of IT experience of which 20 have been in the testing industry. At Assessment Systems Consulting, Steve worked directly with the American Institute of Certified Public Accountants on their conversion of a paper test to computer. He was also a consultant to the Chauncey from 2000-2003 and restructured the IT department.

Steve was also President of Paragon Consulting and led the CBT division including the conversion from paper exam to computer for the NCLEX, NCARB, NAPLEX, PRAXIS, GMAT, GRE and TOEFL programs.

Conflicts of Interest

We do not foresee any conflict of interests with regards to FCC testing as our testing centers do not offer FCC training and do not plan to add this service in the near future. We also do not allow instructors of any kind to become proctors and administer our exams.



Proposed Fee Structure

Our proposed fee structure is to charge \$60 per FCC test administered. We will also offer a 50% discount to the applicant if two or more exams are taken on the same day.

Experience and ability

As stated earlier, three individuals manage LaserGrade LP with vast experience in the testing industry and we will offer FCC examinations in the computer-based format. In the event of a server malfunction, we would be able to provide the exams in a paper-based format. We administer over 100,000 tests per year and have a very good reputation in the testing industry. Our testing center managers go through an extensive background check and are required to be on-site during testing.

Examination Area and Frequency

LaserGrade LP will offer all elements of the FCC examinations at over 700 testing locations in the US and Canada, plus 30 overseas. We have at least one testing center in every state. The exams will be offered seven days a week at most centers. We will offer FCC candidates live call-center registration services every day of the week except Sunday. Applicants will be able to call LaserGrade to schedule an exam using our toll free 800 number.

Time before administering examinations

LaserGrade LP is prepared to start administering FCC exams immediately. Your item bank is located on our servers and we can test the first candidate within 24 hours of approval.

I greatly appreciate your review of our application. If you have any further questions please contact me at 800-211-2753.

Best regards.

Jeff Blake

Executive Vice President

LaserGrade, LP